

AB:ADW

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

FARID DAJER,

Defendant.

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TO BE FILED UNDER SEAL

AFFIDAVIT AND COMPLAINT
IN SUPPORT OF
APPLICATION FOR AN
ARREST WARRANT

(T. 18, U.S.C., § 1344)

19-1149 M

EASTERN DISTRICT OF NEW YORK, SS.:

KAYVAN KAZEMI, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), duly appointed according to law and acting as such.

On or about and between October 1, 2019 and December 3, 2019, those dates being approximate and inclusive, within the Eastern District of New York, the defendant FARID DAJER, together with others, did knowingly and intentionally obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of, one or more financial institutions, by means of false or fraudulent pretenses, representations or promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1344).

The source of your deponent's information and the grounds for his belief are as follows:

1. I am a United States Postal Inspector and have been involved in the investigation of numerous cases involving mail theft and bank fraud. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my conversations with other law enforcement officials; and my review of reports of other law enforcement officers involved in the investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest, I have not set forth each and every fact I have learned during the course of this investigation.

2. On or about December 4, 2019, I spoke with the proprietor of a commercial establishment located in the Eastern District of New York ("Victim 1") who claimed to be the victim of a fraudulent check-cashing scheme. Specifically, Victim 1 said that a check that she had sent in the mail on behalf of her business was deposited into the account of someone other than the intended recipient. Several days after this first conversation, Victim 1 contacted me again and reported that another check she had written and sent in the mail appeared to have been deposited into the account of someone other than the intended recipient. Both checks were deposited into the same account at Bank of America (the "Suspect Account").

3. After my first conversation with Victim 1, I spoke with a Bank of America investigator regarding the Suspect Account. The bank investigator informed me that between October 1, 2019 and December 3, 2019, seven checks appeared to have been fraudulently deposited into the Suspect Account. These seven checks included the two checks written by Victim 1. The investigator reported that all of the individuals or entities listed as the payors on the seven checks had contacted their respective banks, which in turn

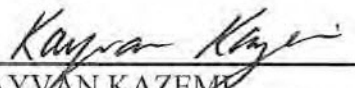
contacted Bank of America, to report that the checks in question had been deposited into the account of someone other than the intended recipient. All seven of the checks were either made out to or endorsed by the same accomplice. In total, the seven checks deposited into the Suspect Account resulted in actual losses of \$26,484.82.

4. Almost all of the seven checks deposited into the Suspect Account were deposited at ATMs located within the Eastern District of New York. Still photographs taken from ATM video footage show that the same individual deposited all seven of the checks into the Suspect Account. Through facial recognition software and other investigative techniques, I was able to determine that this individual was the defendant FARID DAJER.

5. Bank surveillance footage shows that the defendant FARID DAJER has made a number of cash withdrawals from the Suspect Account at ATMs, whereas one or more accomplices have made cash withdrawals from the Suspect Account from bank tellers. In total, DAJER and one or more accomplices have withdrawn more than \$15,000 from the Suspect Account, which amount includes fees charged by the bank in connection with their use of the Suspect Account.

Because public filing of this document could result in a risk of flight by the defendant, as well as jeopardize the government's ongoing investigation, your deponent respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

WHEREFORE, your deponent respectfully requests that the defendant FARID
DAJER be dealt with according to law.


KAYVAN KAZEMI
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
10th day of December, 2019

THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK